UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD

SPECIALTY HEALTHCARE AND REHABILITATION CENTER OF MOBILE)))	
and) CASE	15-RC-8773
UNITED STEELWORKERS, DISTRICT 9, PETITIONER.)))	

AMICUS CURIAE COALITION FOR A DEMOCRATIC WORKPLACE'S REQUEST FOR EXTENSION OF TIME TO FILE BRIEFS

Pursuant to the National Labor Relation Board's ("the Board") Notice and Invitation to File Briefs in Specialty Healthcare & Rehabilitation Center of Mobile, 356 NLRB No. 56 (Dec. 22, 2010), Coalition for a Democratic Workplace ("CDW") intends to file an amicus curiae brief on behalf of it's hundreds of members. Because of the importance of the issues in this case, CDW requests a 30-day extension for the filing of amicus briefs for two reasons.

First, the breadth and complexity of the issues raised in the Board's Notice and Invitation warrants an extension so that the matters can be properly briefed. Through eight questions, the Board asks parties to submit their experiences on a vast array of issues, including their experiences under *Park Manor Care Center*, 305 NLRB 872 (1991); whether *Park Manor* should be overturned and, if so, what rule should replace it; and, finally, whether "a unit of all employees performing the same job at a single facility" should be "presumptively appropriate as a general matter"—an issue with implications far beyond *Park Manor*. An extension is warranted based on breadth and complexity of the issues alone.

Second, an extension is also warranted to allow *amici* such as CDW time to compile and analyze the data necessary to provide the Board's requested "empirical and practical descriptions" of unit determination experiences. *See* Invitation at *2. In order to submit meaningful comment, CDW believes it is important to solicit its members for their experiences and then analyze the information to determine how it informs the issues raised in the Board's Notice and Invitation. Further, CDW anticipates filing an information request with the Board to obtain information and data relevant to the issues raised in *Specialty Healthcare*. It is unrealistic to expect that the Board can furnish, and CDW analyze, that data over the next 30 days.

For the foregoing reasons, CDW requests a 30-day extension for filing its brief in this matter.

Dated: January 24, 2011

Respectfully submitted,

/s/ G. Roger King

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Counsel for Amicus Curiae

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of January, 2011, Amicus Curiae Coalition for a Democratic Workplace's Request for Extension of Time to File Briefs was electronically filed with the National Labor Relations Board and true and correct copies of the request were served by UPS overnight delivery upon:

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/s/ R. Scott Medsker
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January 25, 2011

Please hand deliver the following facsimile to:

Name: Hank Breiteneicher Facsimile No.: 202-273-4270

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Re: Specialty Healthcare and Rehabilitation Center of Mobile (15-RC-8773)

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Message:

Mr. Breiteneicher,

Per our conversation, attached please find *Amicus Curiae* Coalition for a Democratic Workplace's Request for Extension of Time to File Briefs and the E-filing confirmation of the filing.

Thank you,

Amy Zywicki

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Case Information

Case Number: 15-RC-008773

Case Name: Specialty Healthcare and Rehabilitation Center of Mobile

Role: Amicus

Contact Information

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Attached E-File(s)

Request for an Extension of Time to File a Document

Original Due Date: 02/22/2011 Requested Due Date 03/24/2011

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